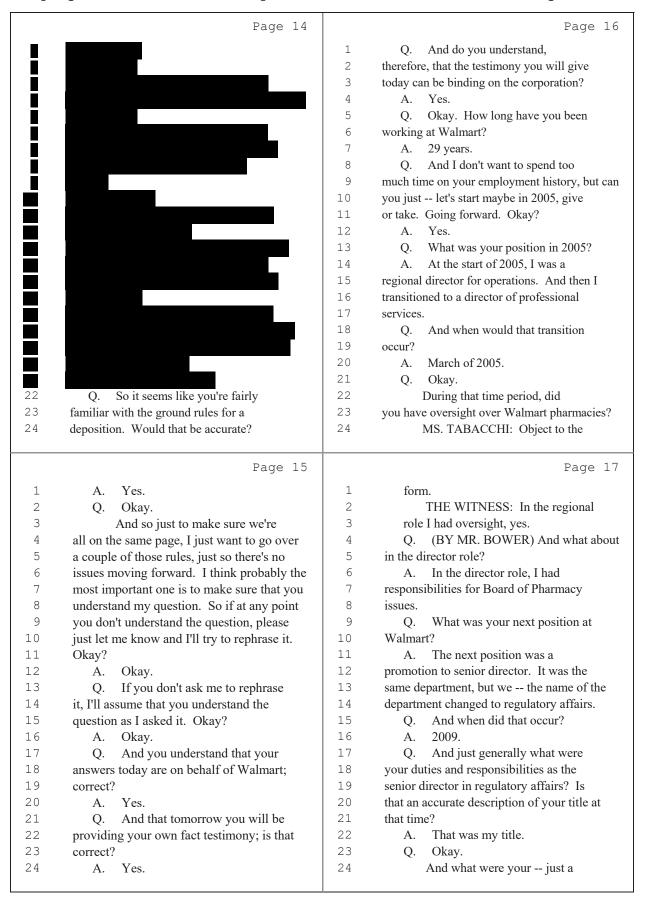
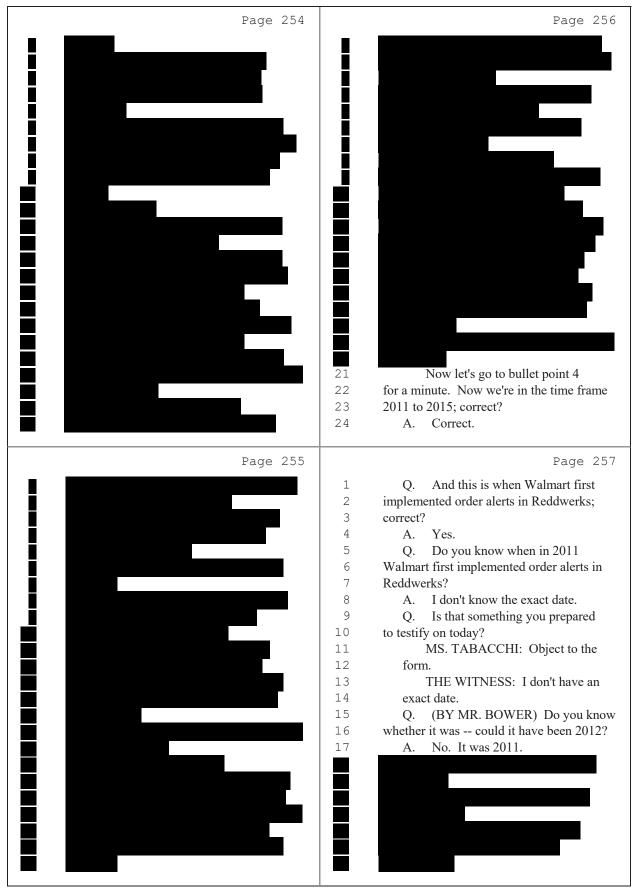
EXHIBIT 19

Page 1 UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION IN RE: NATIONAL MDL No. 2804 PRESCRIPTION OPIATE) Case No. LITIGATION, 1:17-MD-2804 THIS DOCUMENT RELATES TO) Hon. Dan A. ALL CASES Polster Tuesday, January 22, 2019 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER CONFIDENTIALITY REVIEW Videotaped 30(b)(6) Deposition of Walmart, through the testimony of Susanne Hiland, held at 4206 South J.B. Hunt Drive, Rogers, Arkansas, commencing at 8:22 a.m., on the above date, before Debra A. Dibble, Certified Court Reporter, Registered Diplomate Reporter, Certified Realtime Captioner, Certified Realtime Reporter and Notary Public. GOLKOW LITIGATION SERVICES 877.370.3377 ph | fax 917.591.5672 deps@golkow.com

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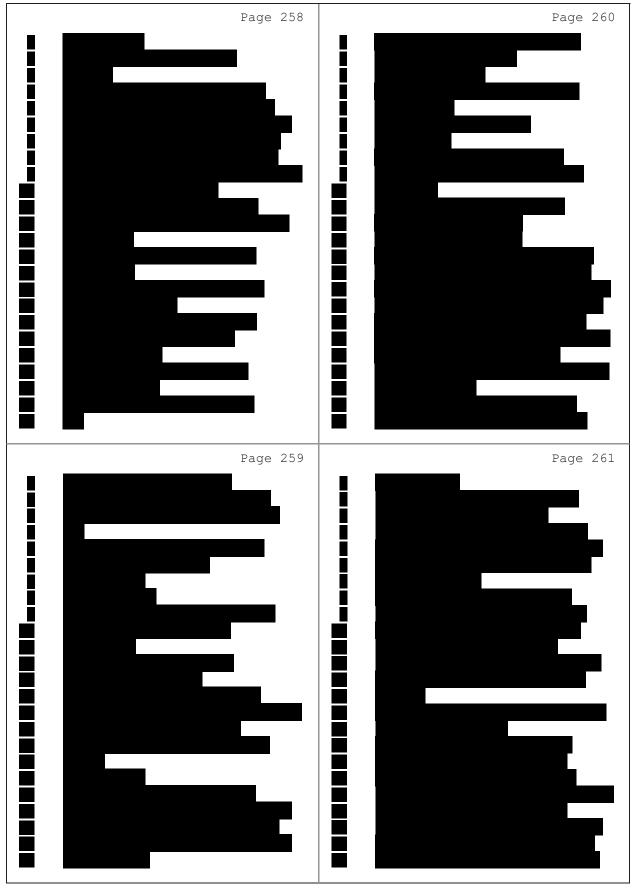


Page 18 Page 20 1 general description of your duties and 1 Q. What's your current title? 2 responsibilities in connection with that 2 A. My current title -- on paper my 3 3 title is Senior Director II, business title. A. I began to supervise the 4 strategy. That's an HR title. 4 5 directors that had responsibility for Board 5 In function, my title is senior of Pharmacy regulation. 6 6 director of professional relations, I also had responsibility for 7 professional practice standards and clinical 7 8 8 our licensing and registration function for services. 9 our facilities. And I had federal regulatory 9 Q. Do you believe you are the 10 10 person at Walmart with the most knowledge of responsibility as it related to our licensed 11 Walmart's maintenance and effective controls 11 pharmacies. 12 12 against diversion? MS. TABACCHI: Zach, of course, 13 MS. TABACCHI: Object to the 13 you're welcome to inquire about the 14 witness's personal background, but 14 form. 15 this is all beyond the scope of the 15 THE WITNESS: I believe that 16 notice. 16 I'm prepared to speak to that topic on behalf of Walmart. 17 MR. BOWER: I'm just trying to 17 MR. BOWER: I move to strike get, like I said, a very high level. 18 18 19 MS. TABACCHI: I just want to 19 that answer. 20 make sure we're on the same page. I'm 20 Q. (BY MR. BOWER) I just would 21 not going to object to every question 21 ask you to please carefully listen to my questions and answer the questions that I 22 during this portion. 22 23 MR. BOWER: No, I understand. 23 ask. Okay? A. Yes. 24 I'm just going to move quickly through 24 Page 19 Page 21 1 this. 1 Q. The question is, do you believe 2 (BY MR. BOWER) And what was 2 that you are the person at Walmart with the 3 most knowledge of Walmart's -- strike that. 3 your next role at Walmart after senior director of regulatory affairs? 4 Do you believe you are the 4 5 person at Walmart with the most knowledge on 5 A. For a short period of time in 6 Walmart's maintenance of effective controls 6 July 2011, I was senior director of 7 compliance and quality assurance. 7 against diversion? 8 8 MS. TABACCHI: Object to the Q. So that was in 2011; is that 9 correct? 9 form, asked and answered. 10 10 A. Yes. THE WITNESS: Yes. 11 (BY MR. BOWER) How did you 11 Q. And then your next role after 12 12 that was? prepare for today's deposition? 13 A. February 2012 of -- I'll likely 13 A. I interviewed current and 14 not get the title correct, but it was senior former Walmart associates, I prepared with 14 15 director of clinical quality assurance. 15 counsel, and I reviewed documents. 16 Q. Okay. 16 Q. Okay. Let's take those one at 17 a time. Get just a little more detail on 17 A. And that was the general title. 18 I'd have to look back to get the title 19 exactly correct. 20 Q. Approximately how many titles 21 would you say you've had at Walmart in your 22 29 years? 23 A. One -- a different one every 24 three years approximately.



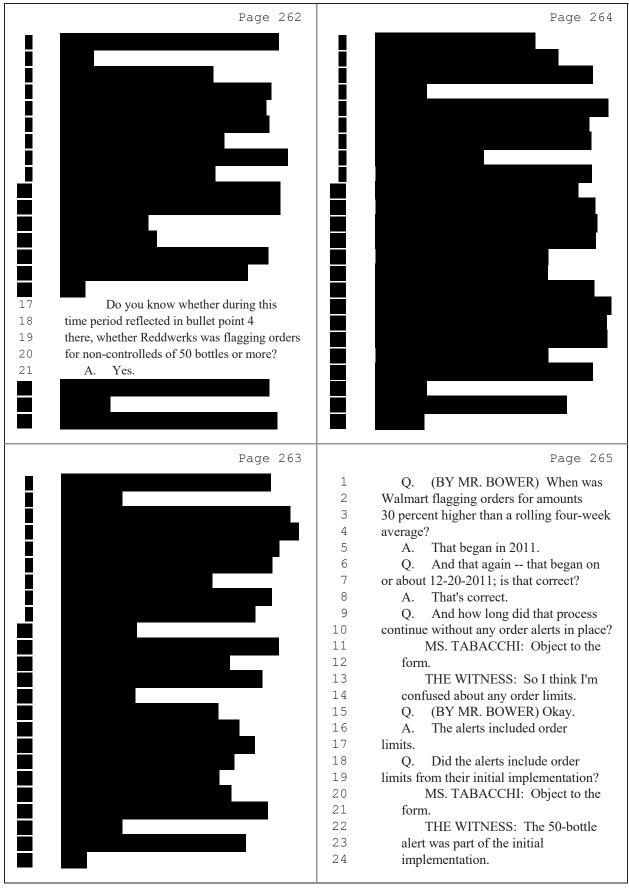
65 (Pages 254 to 257)

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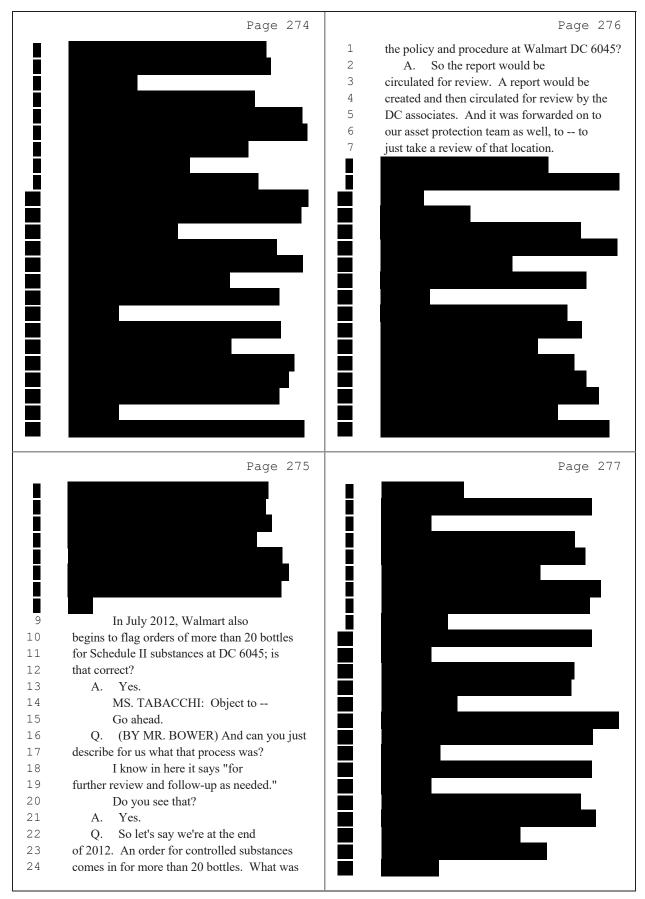


66 (Pages 258 to 261)

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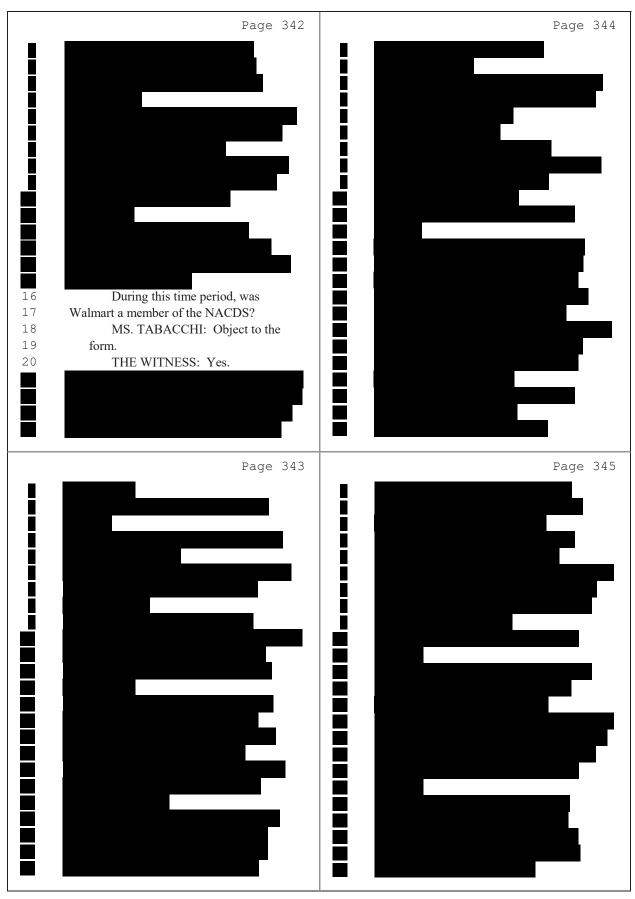


67 (Pages 262 to 265)

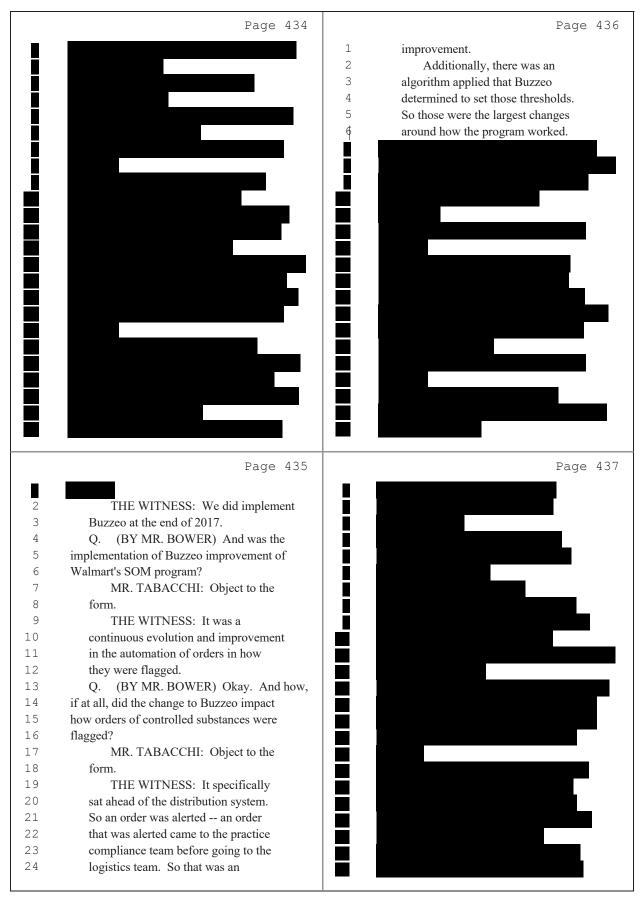


70 (Pages 274 to 277)

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87 (Pages 342 to 345)



110 (Pages 434 to 437)